

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

JAN 14 2021

By: JAMES M. HATTEN Clerk
Deputy Clerk

Civil Action No.

(to be assigned by Clerk)

1:21-CV-0221

IN THE UNITED STATES DISTRICT
COURT
FOR THE NORTHERN DISTRICT OF
GEORGIA

**Pro Se [Non-Prisoner] Complaint
Form**

Enter the full name of the plaintiff in this
action

Glenford Kennard Hyatt

v.

Enter below the full name of defendant(s) in
this action. If possible, please list only one
defendant per line.

M&T Bank

If allowed by statute, do you wish to have a trial by jury? Yes _____ No ✓

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts
involved in this action?

Yes _____ No ✓

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: _____

Defendant(s): _____

2. Court: _____

(If federal court, name the district; if state court, name the county)

3. Docket Number: _____

4. Name(s) of Judge(s) to whom case was assigned: _____

5. Status of Case: _____
(For example, was the case dismissed? Settled? Appealed? Still Pending?)

6. Date lawsuit was filed: _____

7. Date of disposition (if concluded): _____

C. Do you have any other lawsuits pending in the federal court in Georgia?

Yes _____ No ✓

II. PARTIES

In Item A below, place your name and address in the space provided. Do the same for additional plaintiffs, if any.

A. Name of Plaintiff: Glenford Kennard Hyatt .

Address: 4480 S Cobb Drive, Suite H-558, Smyrna, Georgia, 30080 .

Email: glenh4480@gmail.com .

In Item B below, place the full name of the defendant; and his, her, or its address, in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant:

M&T Bank .

Address: P.O Box 1288, Buffalo, New York, 14240 .

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Name: Lakeview Loan Servicing LLC .

Address: 4425 Ponce De Leon Blvd, MS 5-251, Coral Gables, FL, 33146 .

_____ .

_____ .

_____ .

III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.

M&T Bank is in violation of the FCRA and the FDCPA due to the fact that they continue to harass, dishonor, and violate my federally protected consumer rights. I have sent several affidavits to settle the matter concerning the alleged mortgage account number 0103560587, as M&T Bank is the loan servicer for this account and has interest in the property currently owned by Glenford Kennard Hyatt. It is a fact that on May 14th, 2020, I mailed by UPS Next Day Carrier Letter via Tracking number 1Z8845X90174013794, an "Affidavit Of Tender Of Payment And Acknowledgement And Discharge", a formal settlement to M&T Bank, whereas M&T Bank has never responded under penalty of perjury that I owe a debt and validity of a debt obligation or any actual true bill in commerce stating any further direct verification of an obligation of debt, by M&T Bank.

On June 10th, 2020 I mailed by UPS 2nd Day Air Carrier letter via Tracking Number: 1Z8845X90792550794, a "Notice to Agent is Notice to Principle, Notice to Principe is Notice to Agent", another formal settlement to M&T Bank,

whereas M&T Bank has never responded under penalty of perjury. On July 30th, 2020, I mailed by UPS Next Day Carrier Letter via Tracking Number: 1Z8845X90168474870, a "Conditional Acceptance for Value for Proof of Claim ", another formal settlement to M&T Bank whereas M&T Bank has never responded under penalty of perjury.

III. STATEMENT OF CLAIM - continued.

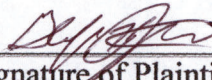
On August 26th, 2020, I mailed by certified mail: 70192970000200231762, a "Second Invoice", another formal settlement to M&T Bank, whereas M&T Bank has never responded under penalty of perjury. On August 26th, 2020, I mailed by certified mail: 70192970000200231762, a "Notice of Fault and Opportunity to Cure and Contest Acceptance", another formal settlement to M&T Bank whereas M&T Bank has never responded under penalty of perjury. On October 27th, 2020, I mailed by certified mail: 9414811899564910818587, a "Notice of Default And Res Judicata", a formal settlement to M&T Bank, whereas M&T Bank has never responded under penalty of perjury. On November 12th, 2020, I mailed by certified mail: 9414811899564128112217, a "Affidavit: Certificate of Non Response and Failure to Contest Acceptance and Agreement", another formal settlement to M&T Bank whereas M&T Bank has never responded under penalty of perjury. On December 5th, 2020, I mailed by certified mail: 9402811899564294714029, a "Affidavit of Fact", another formal settlement to M&T Bank, whereas M&T Bank has never responded under penalty of perjury. M&T Bank has caused willful injury, mental anguish, damage of my credit and they have also defamed my character. I have been a victim of M&T since May of 2020 and have exhaustively attempted to reach a formal settlement with them.

IV. RELIEF.

State briefly and exactly what you want this court to do for you.

I am seeking Monetary Relief in the amount of \$2,151,040.00 for the violations under FDCPA & FCRA, the invoice & fees associated with said invoice from the fee schedule sent to M&T Bank 4 times, and legal consultation fees needed to prepare this attempt of a formal settlement. Also, the removal of all negative information reported to any/all credit bureaus concerning from M&T Bank

Signed this 13 day of January, 2021.



Signature of Plaintiff